

**SANTA MONICA MOUNTAINS CONSERVANCY**

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July 9, 2007

Mr. Jon Foreman  
City of Los Angeles  
200 N. Spring Street, Room 601  
Los Angeles, California 90012

**Notice of Preparation and Initial Study for Metro Universal Project  
SCH#2007061078**

Dear Mr. Foreman:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Initial Study for the Metro Universal Project (Project) and has several comments and recommendations for the Draft Environmental Impact Report (DEIR). The Conservancy is primarily concerned with potentially significant impacts to water quality, recreation, and transportation and circulation. Transportation and circulation impacts must be analyzed with regard to significantly increased traffic volume and its affect on wildlife movement through Cahuenga Pass.

The Project's DEIR should include alternative measures in mitigating for significant impacts on water quality. There must be a major storm water infiltration component to compensate for the elimination of potentially turning the large MTA station parking lot into a permeable surface. The retrofitted Chatsworth Metrolink Station with a simple bioswale is a good model for incorporating a riparian area that serves to remediate storm water run-off. The Conservancy recommends a mitigation measure to construct a one-acre riparian habitat as a means for storm water bioremediation and additional benefits such as habitat for birds and open space for public passive recreation and urban relief.

The Project will drastically change the character of Weddington Park and surrounding neighborhoods with the construction of tall commercial buildings. Possible changes include, but not limited to, altered viewsheds, and limited accessibility due to increase in traffic and population. Under Phase II, Option B, the Initial Study states there may be a potentially significant impact associated with demand of local public parks and recreational areas due to an increase in housing and population. In addition to creating a one-acre

riparian habitat partially for public passive recreation, the DEIR must include mitigation measure for further substantial reduction of public open space.

**Cahuenga Pass Traffic Volume - Wildlife Movement**

The DEIR must look at the Project's traffic impacts along the entire Cahuenga Pass corridor. Like Sepulveda Pass, Cahuenga Pass divides the Santa Monica Mountains creating a barrier for wildlife movement between the eastern Santa Monica Mountains and Griffith Park. Because of the proposed increase in traffic and vehicles within Cahuenga Pass, the Project's study area should extend along Cahuenga Pass and analyze traffic flow and rates throughout a 24 hour period, particularly near the Mulholland Drive and Vine Street overpass. In addition, the DEIR should also analyze potential effects on nocturnal wildlife movement resulting from light pollution caused by increased traffic. Already, wildlife movement across Highway 101 in Cahuenga Pass is severely restricted and the Project would result in an increase in traffic. The Project must include mitigative measures to address these impacts. The Conservancy recommends a mitigation measure of contributing to the Mountains Recreation and Conservation Authority in an escrow account of \$1 million for wildlife corridor improvements in the immediate Cahuenga Pass area to maintain connections between Griffith Park and eastern Santa Monica Mountains.

Please direct any correspondence and questions to Paul Edelman of our staff at the above address and by phone at (310)589-3200, ext. 128.

Sincerely,

ELIZABETH CHEADLE  
Chairperson